

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**DECLARATION OF SARA B.  
TOMEZSKO IN SUPPORT OF  
MOTION TO RETAIN DOCUMENTS  
UNDER SEAL**

I, SARA B. TOMEZSKO, subject to the penalties by law for perjury, do hereby declare the following to be true and correct on the basis of my personal knowledge. If called upon to do so, I would be competent to testify to the matters set forth in this declaration.

1. I am an associate at Paul Hastings LLP, a member in good standing of the Bar of the State of New York, and outside counsel for Defendant in this matter.
2. Attached to my declaration as Exhibit A are relevant excerpts of correspondence with Plaintiff's Counsel regarding her intent to seek leave to supplement her complaint and the documents she identified as those she would attach in support of that request.
3. Attached to my declaration as Exhibit B is a true and correct copy of Plaintiff's December 10, 2020 submission to the Court of confidential documents in support of her pre-motion letter seeking leave to supplement the pleadings (ECF 73). There were three documents attached to that email: Pl.'s Exh. 3 – GOOG-ROWE-0057001-06, portions of the document Google had moved to retain under seal the week prior (ECF 67); Pl.'s Exh. 4 – excerpts from the Deposition of Ulku Rowe; and Pl.'s Exh. 5 – excerpts from the Deposition of Stuart Vardaman Deposition.
4. Attached to my declaration as Exhibit C is a true and correct copy of Plaintiff's December 16, 2020 submission to the Court of confidential documents offered in support of her

Motion to Supplement the Pleadings (ECF 76). There were three documents attached to that email: Pl.’s Exh. 2 - Pl.’s Exh. 3 – GOOG-ROWE-0057001-06, the same document attached as Exh. 3 to Plaintiff’s December 10 Letter; Pl.’s Exh. 3 – excerpts from the Deposition of Stuart Vardaman, including portions for which Google has expedited its review and explicitly agreed to waive confidentiality; Pl.’s Exh. 5 – GOOG-ROWE-00056272.

5. Attached to my declaration as Exhibit D are relevant excerpts of correspondence with Plaintiff’s counsel regarding her intent to file a pre-motion letter for leave to compel comparator discovery, and the documents she intended to attach in support.

6. Attached to my declaration as Exhibit E is a true and correct copy of Plaintiff’s December 17, 2020 submission to the Court of confidential documents submitted in support of her pre-motion letter seeking leave to compel comparator discovery. There were seven attachments to that email: Pl.’s Exh. 2 – excerpts from the Deposition of Kevin Lucas; Pl.’s Ex. 3 – excerpts from the Deposition of Adam Lief; Pl.’s Exh. 4 – excerpts from the Deposition of Tariq Shaukat; Pl.’s Exh. 7 – excerpts from the Deposition of Will Grannis; Pl.’s Exh. 9 – GOOG-ROWE-00060436; Pl.’s Exh. 11 – GOOG-ROWE-00017439; Pl.’s Exh. 12 – GOOG-ROWE-00056990-7014.

7. Plaintiff submitted GOOG-ROWE-00056990-7014, either in its entirety or portions thereof, in each of her December 10, 2020, December 15, 2020, and December 17, 2020 submissions. Portions of that document that Google requests remain under seal have been redacted for purposes of this public filing, per Your Honor’s Individual Practices, Rule 2.E, are attached hereto as Exhibit F. An unredacted copy of that document will be submitted to Chambers.

Signed on the 24th day of December, 2020 in Jersey City, New Jersey.



Sara Tomezsko